

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA

04/14
Herbert Hamlet, Terrell Saunders
Dwight Campbell, Hashim Hamlet
Quentin Wilson, Sam Hamlet
Marvin Anderson, Khalid Satary
John McGhee, Lamar Turner
Otto Taylor, Shams Diggs
Timothy Yuknavich, Marvin Hamilton
Bobby Mabry, John Talley
Gregory Foster, Tommy Thompson
Timothy Morris, Fred Ellis

Plaintiffs
CASE NO. _____

BBM

PLAINTIFFS

VS

US Marshall's Service
South Fulton Municipal REGIONAL JAIL
US Bureau of Prisons
US Attorney General DEFENDANTS

CIVIL Rights Complaint 42 USC 1983

COMES NOW THE PLAINTIFFS PRO SE PURSUANT
TO 42 USC 1983 AS FOLLOWS

I.

THE PLAINTIFFS CONSTITUTIONAL RIGHTS HAVE BEEN
VIOLATED PURSUANT TO THE VIII AND XIV AMENDMENTS
OF THE CONSTITUTION OF THE UNITED STATES

II.

PLAINTIFFS ARE ALL DETAINERS AT THE SOUTH FULTON
METROPOLITAN REGIONAL JAIL, 6500 WATSON ST, UNION CITY,
GEORGIA, WHICH IS UNDER CONTRACT TO THE US MARSHALL'S
SERVICE, AND UNDER JURISDICTION OF THIS COURT

III

THE DEFENDANTS HAVE BEEN DELIBERATELY INDIFFERENT TO THE SERIOUS MEDICAL NEEDS OF THE PLAINTIFFS, CAUSING WANTON AND UNNECESSARY PAIN.

IV

THE DEFENDANTS HAVE WITHHELD AND VIOLATED THE PLAINTIFFS RIGHT TO EXERCISE THEIR RELIGIOUS BELIEFS.

V

THE DEFENDANTS HAVE FAILED TO PROVIDE ADEQUATE MEALS PURSUANT TO THE GUIDELINES ESTABLISHED BY THE U.S. BUREAU OF PRISONS.

VI

THE DEFENDANTS HAVE FAILED TO PROVIDE PROPER HYGIENIC FACILITIES, ACCESS TO OUTSIDE RECREATION, ACCESS TO LAW LIBRARY OR OTHER LEGAL FACILITIES.

VII

THE DEFENDANTS HAVE FAILED TO RESPOND TO THE ESTABLISHED GRIEVANCE SYSTEM IN PLACE FOR FEDERAL PRISONERS.

WHEREFORE THE PLAINTIFF ASKS THIS COURT FOR IMMEDIATE RELIEF AS FOLLOWS.

THE APPOINTMENT OF COURT MONITOR TO OVERSEE THE CORRECTION OF THESE VIOLATIONS OF CONSTITUTIONAL RIGHTS AND LAW

COMPENSATORY DAMAGES IN THE AMOUNT OF (\$400,000.00)
FOUR HUNDRED THOUSAND DOLLARS,
PUNITIVE DAMAGES IN THE AMOUNT OF (\$1,000,000.00)
ONE MILLION DOLLARS, AND ANY OTHER RELIEF THAT
THIS COURT DEEMS PROPER.

Respectfully Submitted This 7th day of March 2004

1. <u>Dale W. Wilson</u>	2. <u>Delight Landell</u>	3. <u>Donnell Saunders</u>
4. <u>Washin Harlett</u>	5. <u>Devin Wilson</u>	6. <u>Saly Harlett</u>
7. <u>Martin Anderson</u>	8. <u>Kimberly Jones</u>	9. <u>Tim McFee</u>
10. <u>Shane James</u>	11. <u>Otto Taylor</u>	12. <u>James Dipp</u>
13. <u>Tony Martin</u>	14. <u>Marni Harlett</u>	15. <u>Tony Johnson</u>
16. <u>John Valley</u>	17. <u>Bobby McKey</u>	18. <u>Jerry Thomas</u>
19. <u>Gregory Foster</u>	20. <u>Fred Ellis</u>	